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2       IN THE UNITED STATES DISTRICT COURT  
3       FOR THE SOUTHERN DISTRICT OF NEW YORK  
4       Civil No.: 19 Civ. 08655 (LGS) (GWG)

5       -----x

6       ULKU ROWE,

7

8               Plaintiff,

9

10

11               - against -

12

13       GOOGLE LLC,

14

15               Defendant.

16       -----x

17               October 14, 2020

18

19               9:39 a.m.

20

21               Videotaped Deposition of ULKU ROWE,  
22       taken by Defendant, pursuant to Notice,  
23       held via Google Hangouts videoconference,  
24       before Todd DeSimone, a Registered  
25       Professional Reporter and Notary Public of  
             the States of New York and New Jersey.

<p style="text-align: right;">Page 22</p> <p>Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 24</p> <p>Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 23</p> <p>1           U. ROWE  2 knowledge, already provided your lawyers  3 with all documents and information that you  4 have in your possession that relates to  5 this case?  6    A. Yes.  7    MR. GAGE: Sara, could you mark  8 tab 6 as Exhibit 3.  9       (Defendant's Exhibit 3 marked  10 for identification.)  11      MS. TOMEZSKO: It should be  12 available now on the drive.  13      Q. Let me know when you have a PDF  14 that is labeled tab 6, Ms. Rowe, and the  15 Bates number on this, for the record, is  16 P001586-1587.  17     A. Yeah, I have it.  18     Q. What is this?  19     A. I believe these are some notes  20 that I took during the conversation with  21 Melissa, Melissa Lawrence.  22     Q. And these notes were recently  23 provided to us in discovery. When did you  24 give these to your lawyer?  25     A. My lawyers had them for a while</p>	<p style="text-align: right;">Page 25</p> <p>1           U. ROWE  2 happened.  3    Q. And when was the conversation?  4    A. So sometime in November of  5 2017.  6    Q. At the top of the document it  7 says 20 November 2017. Do you see that?  8    A. I do.  9    Q. Did you write that date to  10 represent the date you wrote the notes?  11    A. I don't remember that. I don't  12 remember if it was the date of the  13 conversation or the date of the notes.  14    Q. And the first line says  15 "Summary of the items we discussed today."  16       Who is the "we"?</p> <p>17    A. Melissa and I.  18    Q. And how did this conversation  19 take place, was this face to face, was this  20 over the phone?</p> <p>21    A. I believe this was  22 videoconference, video conversation.  23    Q. Who initiated it?  24    A. I did.  25    Q. And to the best of your</p>

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<p>1           U. ROWE 2 knowledge, does this reflect notes that you 3 took close in time to that conversation 4 taking place? 5       A.    Correct. 6       Q.    Did you record everything that 7 was said in the conversation? 8       A.    It is not a transcription of 9 the conversation, it's the highlights of 10 like what stuck with me, the summary of the 11 conversation. 12      Q.    So this reflects what stuck 13 with you from the conversation? 14      A.    Correct. 15      Q.    But not necessarily everything 16 that was said? 17      A.    It was meant to represent a 18 summary of the conversation, yes. 19      Q.    But not necessarily everything 20 that was said? 21      A.    It doesn't capture every single 22 sentence as it was said, but it was also 23 not meant to leave out, you know, major 24 topics. 25      Q.    And Melissa -- what is</p>	<p>Page 26</p> <p>Page 28</p> <p>Page not submitted in support of Google's motion for summary judgment</p>
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	Page 87	Page 89
	Page not submitted in support of Google's motion for summary judgment	<p>1                   U. ROWE</p> <p>2     A. I don't know the exact time</p> <p>3 that he had the cloud experience. No, I</p> <p>4 don't know that.</p> <p>5     Q. So does that mean you do not</p> <p>6 know whether he had more cloud experience</p> <p>7 at the point he joined Google than you had</p> <p>8 when you joined Google?</p> <p>9     A. I don't know that.</p> <p>10    Q. What was his prior cloud</p> <p>11 experience before he joined Google?</p> <p>12    A. So I believe he worked at GE</p> <p>13 and worked on their AWS migration.</p> <p>14    Q. What was your cloud experience</p> <p>15 before you joined Google?</p> <p>16    A. I was at J.P. Morgan working on</p> <p>17 their AWS migration.</p> <p>18    Q. What were you doing working on</p> <p>19 the AWS migration at J.P. Morgan? What was</p> <p>20 your job on that project?</p> <p>21    A. I ran risk systems, I ran</p> <p>22 credit risk systems, and we were migrating</p> <p>23 high credit risk systems to the cloud.</p> <p>24    Q. And what was your role in that</p> <p>25 process of migration?</p>

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<p>1                   U. ROWE 2   A. I ran the team that was working 3 on the migration. 4   Q. You identified Royal Hansen as 5 someone you believe is similarly situated 6 to you. Who is Royal Hansen? 7   A. Royal is an eng VP. 8   Q. What does Royal Hansen do at 9 Google? 10   A. He works in the security area. 11   Q. What does he do? 12   A. He runs an engineering team in 13 security. 14   Q. And what does it mean to run an 15 engineering team in security? 16   A. I don't know what -- I don't 17 know the exact specifics, but, you know, 18 his focus is on security, security 19 products. 20   Q. And what about security 21 products, designing them, building them? 22   A. I believe those would be 23 included, yes. 24   Q. What else does he do? 25   A. I don't know -- I don't know</p>	<p>Page 90</p> <p>Page 92</p> <p>Page not submitted in support of Google's motion for summary judgment</p>
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<p>1           U. ROWE 2 you know, just we're in the same company 3 and I have, you know, I hear his name, and 4 to my knowledge he is still a VP. 5   Q. By the way, while you were at 6 J.P. Morgan, did you -- did J.P. Morgan 7 complete the AWS migration before you left? 8   A. No. 9   Q. When did it start? 10   A. I'm a little hazy on dates, 11 but, you know, I think somewhere around a 12 year before I left is when we started. 13   Q. And prior to working on the AWS 14 migration at J.P. Morgan, had you had any 15 other cloud experience in any of your jobs? 16   A. So before then I didn't 17 actively work on a cloud migration. You 18 know, financial services is an area that 19 has been late to the cloud. It has been a 20 very conservative industry. I had 21 personally read and studied the cloud. 22   Q. Just for your own personal 23 professional interest, correct? 24   A. Correct, while I was at J.P. 25 Morgan.</p>	<p>Page 94</p> <p>Page 96</p> <p>Page not submitted in support of Google's motion for summary judgment</p>
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Page 99	Page 101
1                   U. ROWE 2 you know, someone that provides thought 3 leadership, so, you know, a leadership role 4 outside of OCTO. 5   Q. But when he left OCTO, he also 6 took on responsibility for managing a team 7 of people, correct? 8   A. Correct. That's my 9 understanding. 10   Q. When he was in OCTO, was he 11 managing other people? 12   A. I don't remember if -- I don't 13 remember if he did. 14   Q. Have you at any point in time 15 since you have been at Google managed other 16 people? 17   A. I have not. 18   Q. Is that sometimes referred 19 to -- 20   A. Well, other than my executive 21 assistant. 22   Q. Is that sometimes referred to 23 as an individual contributor? 24   A. Yes. 25   Q. So you have been an individual	Page not submitted in support of Google's motion for summary judgment

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Page 107	Page 109
Page not submitted in support of Google's motion for summary judgment	<p>1                   U. ROWE 2    A.  We have similar 3 responsibilities. 4    Q.  Sufficient for you to consider 5 Mr. Penberthy to be similarly situated to 6 you, correct? 7    A.  So I have since learned that, 8 you know, Scott is at level 8, but I think, 9 what I believe, is my experience and my 10 qualifications are in line with the level 9 11 men in OCTO. 12   Q.  But he is similarly situated to 13 you, correct, Mr. Penberthy? 14   A.  Incorrect. 15   Q.  You gave an answer under the 16 penalty of perjury in your interrogatory 17 response that Scott Penberthy is similarly 18 situated to you, right? 19   A.  Well, at that time, you know, I 20 thought he was a level 9, and through 21 discovery I learned that he was a level 8. 22   Q.  So that changes your answer, 23 right? 24   A.  So, look, I don't know every 25 single qualification and everything that</p>

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<p style="text-align: right;">Page 130</p> <p>1           U. ROWE  2 skills, qualifications and job duties,  3 right?  4           MS. GREENE: Objection.  5    A. Ask me the question again.  6    Q. Let's take -- let's take it  7 differently. Tell me everything that you  8 know about Eric Schenk's job duties and  9 responsibilities.  10 A. I don't know everything that  11 Eric does.  12 Q. I'm asking you to tell me  13 everything that you know.  14 A. But I do know that he works on  15 security. I do know that he does, you  16 know, product and engineering leadership.  17 I do know that he does -- he does client  18 engagements. And I do know that he does  19 some thought leadership.  20 Q. And you do know that he manages  21 people, right?  22 A. I do, yes.  23 Q. What do you know about Eric  24 Schenk's background, experience,  25 qualifications and education?</p>	<p style="text-align: right;">Page 132</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>
<p style="text-align: right;">Page 131</p> <p>1           U. ROWE  2    A. Again, I don't know everything  3 about Eric's background and qualifications,  4 but I do believe that in terms of, you  5 know, his experience and skills, they are  6 comparable to mine.  7    Q. So based upon what you know,  8 sitting here right now, do you believe Eric  9 Schenk is similarly situated to you?  10 A. Yes.  11 Q. Now, if you were to find out  12 that he is a level 8, would your answer  13 change?  14 A. I don't know. I don't know.  15 Q. But you found out that Scott  16 Penberthy is a level 8 and your answer did  17 change, so why wouldn't it change for Eric  18 Schenk?  19           MS. GREENE: Objection.  20 A. Look, I don't know.  21 Q. Okay, you don't know.  22           Let's talk about Paul Strong.  23 Tell us everything you know about Paul  24 Strong's background, experience, and  25 education.</p>	<p style="text-align: right;">Page 133</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>

1           U. ROWE 2 Stuart was included and I wasn't. 3   Q. How many off-sites took place 4 while you worked for Tariq that you were 5 not invited to? 6   A. I don't know. 7   Q. Do you know how many off-sites 8 Tariq had during the time you worked for 9 him? 10   A. I don't know. 11   Q. Do you know if -- do you know 12 if Tariq had any off-sites during the time 13 you worked for him that you were not 14 invited to? 15   A. I don't know. 16   Q. You indicated that you believed 17 you were left out of team meetings. What 18 team meetings were you left out of? 19   A. So Tariq would have regular 20 team meetings that he would use his team 21 e-mail to send invitations to, so I was 22 left out of those, and other meetings where 23 he met with his team members but I wasn't 24 there. 25   Q. How many times did that happen,	Page 170	Page 172  Page not submitted in support of Google's motion for summary judgment
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<p style="text-align: right;">Page 174</p> <p>1           U. ROWE  2 believed you should have been invited to?  3    A. I don't know what the meeting  4 was about, but it was about financial  5 services.  6    Q. Was that at a point at which  7 you were still in Tariq's organization when  8 Leonard Law shared that with you?  9    A. I believe so, yes.  10   Q. Did you believe you should have  11 been in every meeting that Tariq held with  12 anyone who worked on his team?  13   A. No.  14   Q. Did you believe that you should  15 have been invited to every meeting with  16 Tariq that had anything to do with  17 financial services?  18   A. No. But I do believe that I  19 should have been in every staff meeting  20 that he had.  21   Q. When you first came to believe  22 you were not on the e-mail list for his  23 staff meetings, what did you do? Did you  24 tell anyone?  25   A. Yes.</p>	<p style="text-align: right;">Page 176</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>
<p style="text-align: right;">Page 175</p> <p>1           U. ROWE  2    Q. Who did you tell?  3    A. So, first, I asked my admin to  4 check with Tariq's admin to make sure it  5 was okay, then I asked -- I believe I asked  6 Tariq's admin directly, and, finally, I  7 asked Tariq.  8    Q. And what did you learn?  9    A. The responses changed over  10 time, but it was, you know, first, I  11 think -- I think some of the answers were  12 they were working on the e-mail lists, so,  13 you know, it was in flight. Other times it  14 was an oversight. Other times it was, you  15 know, they forgot. You know, so the  16 answers changed.  17   Q. Do you have any reason to  18 believe that any of the responses you got  19 were false?  20   A. Look, I don't have any reason  21 to believe the responses were false, but I  22 knew that my male peers were in these  23 meetings and I wasn't, so I was being  24 treated differently.  25   Q. What male peers?</p>	<p style="text-align: right;">Page 177</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>

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<p>1                   U. ROWE  2 meetings with any of the institutions you  3 just listed, [REDACTED],  4 [REDACTED], and [REDACTED]  5 [REDACTED] during the time that you worked with  6 Tariq?  7       A. Look, I don't remember the  8 individual meetings. Again, like I have a  9 lot of customer meetings, so I can't -- I  10 don't know how many or what time with what  11 customers. It is hard for me to remember  12 right now.  13      Q. So you don't know one way or  14 the other whether you met with any of those  15 banks during the time you worked for Tariq?  16      A. I just don't remember, yeah. I  17 do remember, you know, having client  18 meetings during my time working for Tariq,  19 I just couldn't tell you with what customer  20 over what period.  21      Q. How many months did you work  22 for Tariq, approximately?  23      A. I think roughly it was about  24 ten months.  25      Q. During that ten-month period,</p>	Page 186	<p>1                   U. ROWE  2       A. I just can't remember what type  3 of clients I was working with during  4 Tariq's time, so it is hard for me to  5 answer.  6       Q. But my question, I wasn't  7 asking you which ones, I was asking you  8 whether during the time you worked with  9 Tariq you developed any sort of a regular  10 schedule or regular cadence of having  11 meetings with priority clients?  12      A. So, again, you know, a lot of  13 the meetings are not on a cadence. They  14 depend on the account team wanting to have  15 that meeting at a customer. They are not  16 like weekly recurring meetings all the  17 time. But during my time working for  18 Tariq, I did have many customer meetings  19 with the priority accounts. I just, again,  20 can't remember which customer when.  21      Q. So when you say the accounts  22 team, are those the folks in sales?  23      A. Yes.  24      Q. So the sales folks would come  25 to you and they would essentially dictate</p>	Page 188
<p>1                   U. ROWE  2 how many customer meetings did you  3 participate in with the customers we have  4 just been talking about?  5       A. I don't remember the exact.  6 Yeah, I don't remember.  7       Q. Was it something you did once a  8 month with each of them? Withdrawn.  9       Did you have regular meetings  10 with each of these customers?  11      A. No. A lot of these are not  12 like, you know, most of these customers you  13 don't meet, you know, every day on an  14 ongoing basis. Usually it changes with the  15 demand that is coming from the customer  16 team and where that relationship is. So I  17 know that like on a given week or on a  18 given month I have multiple customer  19 meetings usually a week, but like I can't  20 remember what customer I met with what week  21 or what month during this time.  22      Q. During the time that you worked  23 for Tariq, did you develop any sort of a  24 regular cadence with any of the priority  25 clients?</p>	Page 187	<p>1                   U. ROWE  2 when these customer meetings took place; is  3 that fair?  4       A. Well, they wouldn't dictate,  5 no.  6       Q. Then did you go to the accounts  7 team and tell them to schedule meetings  8 with customers?  9       A. No.  10      Q. Well, tell me how it worked.  11      A. Usually they would come with a  12 request to say, you know, we're trying to  13 do something with this customer, like we  14 are trying to talk to this team, that team,  15 this team, and would collectively figure  16 out what the right time would be, who the  17 right individuals would be, and what the  18 meeting would look like.  19      Q. And was it the account team  20 that took the initiative to get these  21 going?  22      A. Usually the requests come from  23 the account teams.  24      Q. Did you yourself target any  25 particular clients, particular, you know,</p>	Page 189

<p style="text-align: right;">Page 190</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 192</p> <p>1           U. ROWE 2 storage engineering. 3   Q. Did you get that job? 4   A. So that job didn't pan out, 5 because the hiring manager left Google. 6   Q. What was the second opportunity 7 at Google that you pursued? 8   A. So after that Google would call 9 me every few months with different 10 opportunities, but I don't think, you know, 11 any of them were right, so Office of the 12 CTO was the first one, after the role in 13 storage engineering, that I actually came 14 in and interviewed for. 15   Q. And is that job, the one in 16 OCTO, the one you ultimately got, is that 17 the one you are referring to? 18   A. Yes. 19   MR. GAGE: Sara, can we share 20 tab 15, and, Mr. Court Reporter, what 21 exhibit are we up to? 22   THE COURT REPORTER: This 23 should be 5. 24   (Defendant's Exhibit 5 marked 25 for identification.)</p>
<p style="text-align: right;">Page 191</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 193</p> <p>1           U. ROWE 2   Q. Mr. Rowe, let me know when you 3 have that. 4   A. Yes, I have that. 5   Q. Is this the description of the 6 job that you ultimately were hired for? 7   A. Yes. 8   Q. And when you were hired for 9 this position, the position of technical 10 director, Office of the CTO, Google Cloud, 11 what was your understanding of what your 12 job duties would be? 13   A. There would be three main 14 components to it, one around product and 15 eng, second around client engagements at 16 the CXO level, and third, thought 17 leadership in the industry, so outward 18 facing and also internal facing. 19   Q. Let's take those apart one at a 20 time. 21   The first one, you said product 22 and engineering. Now, those are two nouns, 23 as I understand them. Can you translate 24 that into what that means for job duties? 25   A. So it means that providing</p>

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<p>1                   U. ROWE  2 guidance and advice into the product teams  3 in terms of, you know, how to build Google  4 Cloud's products so that they served the  5 industry needs.  6   Q.  And then the second thing you  7 mentioned was client engagement at the CXO  8 level. Can you expand on that?  9   A.  So that means working with  10 Google's, you know, most important clients  11 to understand their business needs, you  12 know, what they want the future of their  13 businesses to look like, and then to work  14 with them to plot out a strategy on how  15 Google Cloud's technology could help them  16 achieve that, you know, again, providing  17 them guidance, advisory, working with a  18 collaborative group of Googlers, not just  19 about Google Cloud's technology, but Google  20 technology broader, to solve the big  21 customer problems and to help them use  22 Google Cloud.  23   Q.  And then the last component you  24 said was thought leadership. Can you  25 explain what you understood that to mean?</p>	<p>Page 194</p> <p>Page 196</p> <p>Page not submitted in support of Google's motion for summary judgment</p>
<p>1                   U. ROWE  2   A.  So thought leadership is  3 basically having credibility in the  4 marketplace, you know, both again  5 externally and industry, to provide a  6 direction and strategic thinking into how  7 the industry is changing, how technology is  8 enabling that change, you know, be the  9 voice of Google, be the technical voice of  10 Google, the industry voice of Google, to  11 actually shape how the future of the  12 industry is going to work, you know, go  13 through like an industry perspective on the  14 way the technology supports that.  15   Q.  And when you were hired into  16 this job, what was your understanding of  17 who you would report to?  18   A.  Will Grannis.  19   Q.  And what was your understanding  20 at the time you were hired into this job of  21 Will Grannis' job duties and  22 responsibilities?  23   A.  So obviously Will was leading  24 the team, and other than that, you know,  25 his responsibilities were similar to what I</p>	<p>Page 195</p> <p>Page 197</p> <p>Page not submitted in support of Google's motion for summary judgment</p>

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<p style="text-align: right;">Page 202</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 204</p> <p>1           U. ROWE  2   A. Well, Google has asked me on  3 their behalf to speak on Google and Google  4 Cloud on many, many occasions, describing  5 me as a Google Cloud expert.  6   Q. Are you aware of any documents  7 that existed at the time you were hired by  8 Google that described you as an expert in  9 cloud computing?  10   A. I am not aware of that.  11   Q. During the hiring process that  12 we are talking about that led to you being  13 hired as a technical director in the Office  14 of the CTO, didn't you at one point  15 indicate that you were not an expert in  16 cloud computing?  17   A. I don't remember that. Again,  18 context is important here. Like being an  19 expert in cloud computing in financial  20 services versus being an expert in cloud  21 computing in a cloud native company can  22 mean different things, so context is  23 important.  24   Q. Well, let's go back to that for  25 a minute. You described a minute ago what</p>
<p style="text-align: right;">Page 203</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 205</p> <p>1           U. ROWE  2 you understood Google was looking for.  3 What was the basis for that understanding,  4 was it the job description?  5   A. It was the job description and  6 my conversations with Will and other  7 interviewers.  8   Q. Will and who else, what other  9 people?  10   A. Will, HR person, Jenny, the  11 people that have interviewed me, I think  12 Brian was one of them, Salman was I think  13 another interviewer. I can't remember all  14 the names of the interviewers.  15   Q. Does the document that we have  16 marked here as Exhibit 5, Position  17 Description for Technical Director, Office  18 of the CTO, does it fairly describe the  19 responsibilities of the job that you were  20 hired for and then performed in the Office  21 of the CTO?  22   A. So this is tab 15, right?  23   Q. Yes, tab 15, yes, I'm sorry.  24   A. Yes, it's fair.  25   Q. Do you know who Krista</p>

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<p>1           U. ROWE  2 Callaghan is?  3   A. I think Krista was an HR  4 person.  5   Q. And she was somebody that you  6 communicated with during the recruiting and  7 hiring process, correct?  8   A. I believe so.  9        MR. GAGE: Sara, can we put up  10 tab 16, and this will be Exhibit 7, and  11 this is Bates stamped P000550 through 552.  12        (Defendant's Exhibit 7 marked  13 for identification.)  14   A. Okay.  15   Q. Do you have it?  16   A. Yes.  17        MS. GREENE: I'm sorry, can you  18 just repeat what tab we are looking at?  19        MR. GAGE: Tab 16.  20        MS. GREENE: Thank you.  21   Q. Ms. Rowe, this is an e-mail  22 exchange between you and Krista Callaghan  23 at Google, right?  24   A. Yes.  25   Q. Do the dates indicate that this</p>	<p>Page 206</p> <p>Page 208</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>
<p>Page 207</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>	<p>Page 209</p> <p>1           U. ROWE  2   Q. So is that a yes?  3   A. So the question was? Ask your  4 question again.  5   Q. So does this refresh your  6 recollection that you told Krista Callaghan  7 that you were not a cloud expert?  8   A. Yes. Yeah, it refreshes my  9 memory.  10   Q. Right, okay. So you did,  11 during this process of being recruited to  12 Google, say to Google you were not a cloud  13 expert, right?  14        MS. GREENE: Objection.  15   A. In this e-mail, yes, I said  16 that in this e-mail.  17   Q. Well, actually she said this in  18 this e-mail, right? She was describing the  19 conversation she had with you, right?  20   A. Correct.  21   Q. And you just indicated that you  22 were coming from an industry that had been  23 late to adopting the cloud, and that's one  24 of the reasons you were not a cloud expert,  25 correct?</p>

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<p>1           U. ROWE 2   A.  Correct. 3   Q.  And at the point at which you 4  were hired by Google, did you have any 5  experience at all building cloud products? 6   A.  So I had experience using cloud 7  products, but J.P. Morgan does not sell 8  cloud, so I did not have experience 9  building cloud products. 10   Q.  And was your cloud experience, 11 at the time you were hired by Google, 12 limited to your work on the cloud migration 13 project at J.P. Morgan that you described 14 earlier today? 15   A.  Incorrect. 16   Q.  I think you said incorrect, but 17 we had a frozen screen here. So am I 18 right, you said incorrect? 19   A.  I said incorrect because, you 20 know, my experience wasn't just limited to 21 that. Obviously, you know, we are reading, 22 you know, and catching up with the industry 23 as things were happening, but, broadly 24 speaking, yes. 25   Q.  Now, during the recruiting</p>	<p>Page 210</p> <p>Page not submitted in support of Google's motion for summary judgment</p>	<p>Page 212</p>
	<p>Page 211</p> <p>Page not submitted in support of Google's motion for summary judgment</p>	<p>Page 213</p> <p>Page not submitted in support of Google's motion for summary judgment</p>

<p>1                   U. ROWE  2                   MS. GREENE: Objection.  3           Q. And you can't think of anything  4 else right now other than the fact that  5 some men were hired as level 9's, and what  6 you believe to be their relative level of  7 experience and qualifications, you can't  8 think of anything else that leads you to  9 believe that your hiring -- your leveling  10 at hire was because of your sex?  11           MS. GREENE: Objection.  12           A. That's not what I said. You  13 know, I said it was because of my own  14 qualifications, what I know to be true  15 about myself. I know the qualifications of  16 the men. And I know, you know, the roles  17 that they are playing. And I know, you  18 know, the expectations of a level 9 at  19 Google. So all of those are part of the  20 reasons that led me to believe.  21           Q. You are talking about the  22 people who you believe are your  23 comparators, correct?  24           A. Yes.  25           Q. So other than the fact that you</p>	<p>Page 238</p> <p>Page 240</p> <p>Page not submitted in support of Google's motion for summary judgment</p>
<p>1                   U. ROWE  2 have identified these men as your  3 comparators, other than the fact that you  4 believe that you are sufficiently similar  5 to them in terms of your qualifications,  6 your experience and your job, other than  7 that, is there anything else that leads you  8 to believe that your leveling at hire was  9 because of your sex?  10           A. I can't think of anything else  11 right now.  12           Q. At the time you were offered  13 the job, did you raise any questions or  14 issues regarding your level?  15           A. I did.  16           Q. With whom?  17           A. So before the hiring, you know,  18 before I signed the offer, I did raise  19 concerns that, you know, that I was a  20 managing director, you know, I was the  21 highest level of promotion in the financial  22 services industry, and I wasn't sure if  23 level 8 was the right level. The first  24 time I raised that was with Jenny Burdis.  25           Q. With who, I'm sorry?</p>	<p>Page 239</p> <p>Page 241</p> <p>Page not submitted in support of Google's motion for summary judgment</p>

<p style="text-align: right;">Page 262</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 264</p> <p>1                   U. ROWE 2                   MS. GREENE: Objection. 3           A. Well, I knew what kind of 4 individuals were, and based on that I made 5 the statement that I was better qualified. 6           Q. Now, you have since, in the 7 course of discovery, come to know who some 8 of the other candidates were, correct? 9           A. I saw some of the names, yes. 10          Q. Were you better qualified than 11 all of them? 12          A. Look, I don't know, and I can't 13 speak to all of their qualifications, but I 14 know who the role ultimately went to, and 15 I -- and I kind of know my qualifications 16 with respect to that individual, so I can 17 speak to that. 18          Q. Do you know who [REDACTED] 19 is? 20          A. I have heard the name. 21          Q. Do you know anything about her 22 qualifications? 23          A. I don't know much. I know that 24 at some point she [REDACTED] 25 [REDACTED] -- I don't know if she is still</p>
<p style="text-align: right;">Page 263</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 265</p> <p>1                   U. ROWE 2 a VP, I don't know if she is still at 3 Google. 4          Q. Based upon what you know about 5 her, do you think you are better qualified, 6 equally qualified, or lesser qualified than 7 she would be for the head of financial 8 services role? 9          A. I can't comment on that. 10         Q. Why not? 11         A. I don't know. 12         Q. But you don't hesitate to 13 comment about your relative qualifications 14 compared to somebody's whose identity you 15 don't even know? 16          MS. GREENE: Objection. 17         Q. Right? 18         A. I know the qualifications that 19 they were missing. 20         Q. What qualifications was [REDACTED] 21 [REDACTED] missing? 22         A. I don't know [REDACTED] 23 enough to talk about. 24         Q. What qualifications were these 25 other unnamed candidates missing?</p>

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1                   U. ROWE 2 experience. 3   Q.  What about [REDACTED], do 4 you know anything about her? 5   A.  I don't. 6   Q.  So is it fair to say you don't 7 have an opinion as to whether you are 8 better, equal, or lesser qualified for the 9 head of financial services role than her? 10   A.  Look, I can't comment on 11 individuals. 12   Q.  Because you would be 13 speculating, right? 14    MS. GREENE: Objection. 15    A.  Because my claims and concerns 16 are about how I have been treated, not how 17 other candidates have been treated in this 18 process. 19    Q.  Let's move on to another topic. 20       You on multiple occasions have 21 said that Stuart Breslow got the head of 22 financial services job that you were being 23 considered for, right? 24    A.  Yes. 25    Q.  Do you know whether Stuart	Page 267
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<p>Page 278</p> <p>Page not submitted in support of Google's motion for summary judgment</p>	<p>Page 280</p> <p>1 U. ROWE  2 sorry?  3 A. I considered all of those  4 options as demotions.  5 Q. As demotions, okay. Why did  6 you consider them demotions?  7 A. Well, one of them wasn't even a  8 role, it was go find another job, like I  9 would have no job, the other one was a much  10 more junior role, you know, working as a,  11 you know, in a much smaller focus project,  12 I think the [REDACTED] project at the time, much  13 more junior role, or I would go back to  14 OCTO, but Google would remove all of my  15 financial services focus.  16 Q. And you chose to go back to  17 OCTO, correct?  18 A. Correct.  19 Q. Now, when you first moved over  20 into Tariq Shaukat's organization from  21 OCTO, Ben and Evren also moved from OCTO  22 into Tariq's organization, correct?  23 A. So they were also told that  24 they were moving. I believe Evren never  25 actually moved.</p>
<p>Page 279</p> <p>1 U. ROWE  2 A. After Stuart got the job, is  3 that what you are asking, did I discuss  4 with Tariq?  5 Q. Yes.  6 A. No.  7 Q. Did you ever have any  8 discussions with Mr. Shaukat about what  9 your role would be in his organization  10 going forward?  11 A. So in, I think it was in  12 February, I was told that my role was being  13 changed. I was given, you know, three  14 options.  15 Q. What were those three options?  16 A. I was given an option to work  17 on a focused small project, working for  18 Stuart Breslow. I was given the option to  19 go back to OCTO without a financial  20 services focus. And third option wasn't  21 really even real, it was that I could stay  22 and he could park me under Stuart until I  23 found a different role. And I considered  24 all of these three as demotions.  25 Q. You had all of these, I'm</p>	<p>Page 281</p> <p>Page not submitted in support of Google's motion for summary judgment</p>

<p>Page not submitted in support of Google's motion for summary judgment</p>	<p>Page 282</p> <p>1           U. ROWE 2   Q. You indicated that -- you 3 testified earlier today that you believe 4 you were denied equity refreshes because of 5 your sex. Tell me everything that leads 6 you to believe that the equity refreshes 7 you got, the amount of them, or when you 8 didn't get equity refreshes, what leads you 9 to believe that that was because of your 10 sex.</p> <p>11   A. Well, I was down-leveled on 12 hire, and that translated into lower 13 compensation as well as lower equity 14 refreshes compared to my male peers.</p> <p>15   Q. Is there anything else that 16 leads you to believe that your equity 17 awards were based on your sex?</p> <p>18   A. Well, yeah, I can't think of 19 anything else, it's basically the way that 20 I was leveled, and that carried on, you 21 know, that continued to haunt me, so to 22 speak, through my time at Google.</p> <p>23   Q. Now, you used a term a minute 24 ago that I don't think either of us have 25 used in today's deposition until now, and</p>	<p>Page 284</p>
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<p style="text-align: right;">Page 286</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 288</p> <p>1           U. ROWE 2           MS. GREENE: Objection. 3    A. I don't -- I don't know for a 4 fact. 5    Q. You don't know at all, do you? 6    MS. GREENE: Objection. 7    A. Well, I do know -- I do know 8 the level 9 men and my qualifications with 9 respect to them. 10   Q. And the level 9 men are the 11 only ones that you looked at, right? 12    MS. GREENE: Objection. 13    Q. Right? 14    A. Look, I didn't look at people 15 individually. Like this is broader than 16 just me comparing myself to four or five 17 individuals, this is me knowing my 18 qualifications and the kind of experience 19 that Google looks for in a L9 eng director 20 and knowing that, you know, I have those 21 similar qualifications. 22    Q. Have you ever hired a level 9 23 at Google? 24    A. I have not. 25    Q. Have you ever hired anyone at</p>
<p style="text-align: right;">Page 287</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 289</p> <p>1           U. ROWE 2 Google? 3    A. I have not. 4    Q. Have you ever been through the 5 leveling process at Google, as a 6 participant in the process of leveling 7 someone? 8    A. I have not. 9    Q. Have you ever participated in a 10 hiring committee? 11   A. I have not. 12   Q. Have you ever participated in 13 any way in the decision-making process that 14 leads to the leveling of someone at hire at 15 Google? 16   A. I have done a lot of 17 interviews, but no, I have not specifically 18 been involved in leveling discussions, no. 19   Q. And in any of those interviews, 20 were you asked to offer an opinion as to 21 the level that someone was supposed to -- 22 that someone might get? 23   A. I have not. 24   Q. You indicated earlier in your 25 testimony that there was another</p>

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<p>1           U. ROWE 2 opportunity, VP, financial services and 3 sales, that you applied for in 2020. Do 4 you recall that testimony? 5       A. I raised my hand for it. 6       Q. What do you mean when you say 7 you raised your hand for it? 8       A. I expressed interest in it. 9       Q. And how did you express 10 interest in it? 11      A. I heard from Kristen, and I'm 12 completely blanking on her last name, 13 Kristen runs sales for U.S., and I had -- I 14 had a one-on-one with her, and she 15 mentioned that she was thinking of hiring a 16 VP of sales for financial services, and I 17 told her that I would be interested. 18      Q. And what, if anything, happened 19 next in connection with your interest in 20 that job? 21      A. So she asked me to reach out to 22 HR, so I reached out to HR. 23      Q. Who did you reach out to in HR? 24      A. I think it was Stuart Weidman, 25 I'm not 100 percent sure.</p>	Page 290	Page 292
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<p style="text-align: right;">Page 298</p> <p>1           U. ROWE  2 the three options that were presented to  3 me.  4 Q. You had three options, and you  5 chose, no one else chose for you, correct?  6 A. Of the options that were given  7 to me, yes, going back to OCTO was what I  8 chose.  9 Q. And Google had decided that  10 when you were in OCTO, you were going to be  11 focused on hybrid cloud, correct?  12 A. Yes.  13 Q. Do you have any reason to  14 believe that that decision to have you  15 focus on hybrid cloud was made because you  16 had raised complaints of discrimination?  17 MS. GREENE: Objection.  18 A. So I don't know what went into  19 that discussion, but what I have  20 experienced was Google removed all my  21 financial services related  22 responsibilities, Google isolated me  23 internally and externally, and I know that  24 I was also denied further opportunities.  25 Q. I'm talking right now about</p>	<p style="text-align: right;">Page 300</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>
<p style="text-align: right;">Page 299</p> <p>1           U. ROWE  2 what you have described as the isolation.  3 And you previously testified about what you  4 described was the isolation while you were  5 on Tariq's team. I'm now focused on you  6 being back in OCTO and being told that you  7 were to focus on cloud -- hybrid cloud.  8 A. Yes.  9 Q. Do you have any reason to  10 believe that the decision to have you focus  11 on hybrid cloud was because you had raised  12 complaints of discrimination?  13 MS. GREENE: Objection.  14 A. I don't know what actually went  15 into that decision. I know the net effect  16 was Google removed all my financial  17 services responsibilities.  18 Q. Do you have any reason to  19 believe that that decision was because you  20 raised complaints of discrimination?  21 MS. GREENE: Objection.  22 A. Look, I don't know for a fact,  23 but I do know what happened to me.  24 Q. Right. You were told to focus  25 on hybrid cloud, right?</p>	<p style="text-align: right;">Page 301</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>

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	<p>1                   U. ROWE 2 specific than that. Did Will Grannis ever 3 say or do anything that leads you to 4 believe that he would intentionally treat 5 you differently because of your gender? 6     A. So to my recollection, he 7 hasn't said anything. I think when it 8 comes to doing, you know, he was my hiring 9 manager and I was down-leveled and paid 10 lower than my peers in hiring, so by that 11 action, yes, he was a part of it. 12    Q. So other than the fact that he 13 was your hiring manager and he was involved 14 in the decision about your leveling, other 15 than that fact, is there anything else that 16 Will Grannis has ever done or said that 17 leads you to believe that he would treat 18 you differently because of your sex? 19    A. I can't think of any other. 20    Q. Is that also true for Brian 21 Stevens? 22    A. Yes. 23    Q. At some point after you joined 24 Google you started looking for another job, 25 correct?</p>

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<p style="text-align: right;">Page 322</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 324</p> <p>1           U. ROWE  2 are both eng jobs, so they are both under  3 the same eng leveling guide. They both  4 attend the eng leadership meetings. They  5 attend, you know, quarterly tech leadership  6 summits. So for many purposes they are  7 treated similarly, they are considered eng  8 leadership roles.</p> <p>9   Q.   Have you ever seen the  10 engineering leveling guide?</p> <p>11   A.   Yes.</p> <p>12   Q.   When was the first time you saw  13 that?</p> <p>14   A.   I don't remember the date.</p> <p>15   Q.   Was it in connection with  16 discovery in this case?</p> <p>17   A.   No. I don't know if I saw it  18 as part of discovery, but I saw it at  19 Google, you know, as part of my being an  20 employee at Google.</p> <p>21   Q.   Do you know what a director,  22 product management, does at Google?</p> <p>23   A.   So, sorry, there is something  24 going on with my lighting. I apologize for  25 that.</p>
<p style="text-align: right;">Page 323</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 325</p> <p>1           U. ROWE  2           So director, product  3 management, are similar, they are  4 considered eng roles. They have, you know,  5 similar -- they require similar  6 qualifications, you know, similar  7 responsibilities to what I just said for  8 the other two.</p> <p>9   Q.   So as far as you're concerned  10 they are the same as director, software  11 engineering, and director, application  12 engineering?</p> <p>13   A.   No, I did not say they are  14 exactly the same.</p> <p>15   Q.   How are they different?</p> <p>16   A.   I don't know how, you know, the  17 day-to-day responsibilities of those roles  18 are, but I do know that they are pretty  19 comparable.</p> <p>20   Q.   Are you qualified to be a  21 director, software engineering?</p> <p>22   A.   I believe so.</p> <p>23   Q.   Are you qualified to be a  24 director of application engineering?</p> <p>25   A.   I believe so.</p>

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<p>1                   U. ROWE</p> <p>2 comparable.</p> <p>3   Q.  How are they different?</p> <p>4   A.  I don't know what he does on a</p> <p>5 day-to-day basis, so I don't know, you</p> <p>6 know, what he does that might be different,</p> <p>7 but what I do know is that, you know, he</p> <p>8 does provide, you know, product and</p> <p>9 engineering guidance. He does provide</p> <p>10 thought leadership. He works across the</p> <p>11 organization. And he does have -- he does</p> <p>12 have, you know, client facing, and</p> <p>13 understanding his clients and building</p> <p>14 product type responsibilities.</p> <p>15   Q.  Does he write code as part of</p> <p>16 his job?</p> <p>17   A.  I don't know.</p> <p>18   Q.  Do you?</p> <p>19   A.  I don't, not production code.</p> <p>20   Q.  Have you ever, since you have</p> <p>21 been at Google?</p> <p>22   A.  So I have written code, but I</p> <p>23 have not contributed code to Google's</p> <p>24 products, if that's what you are asking.</p> <p>25   Q.  Do you know anyone else who is</p>	<p>Page 327</p> <p>Page 329</p> <p>Page not submitted in support of Google's motion for summary judgment</p>

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<p>1                   ULKU ROWE 2       A. She is the head of North American 3       sales at Google. 4       Q. When did you first come to know 5       Miss Kliphouse? 6       A. I don't remember the exact date, 7       but shortly after she joined Google. 8       Q. When was that? 9       A. I think it was like beginning of 10      the year. 11      Q. Beginning of what year? 12      A. 2020. 13      Q. How did you first meet Miss 14      Kliphouse? 15      A. She and I had a one-on-one meet 16      and greet. 17      Q. How did that one-on-one meet and 18      greet come about? 19      A. I reached out to her. She was new 20      at Google and I said I would like to meet and 21      say Hi and introduce myself. 22      Q. Why did you reach out to her? 23      A. It's customary, she is head of 24      sales, I do a lot of work with sales, so it was 25      a kind of say Hi meeting.</p>	<p>Page 336</p> <p>Page not submitted in support of Google's motion for summary judgment</p>	<p>Page 338</p>
		<p>Page 337</p> <p>Page not submitted in support of Google's motion for summary judgment</p>



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1                   ULKU ROWE 2                   role. 3           Q. You also get involved in business 4           development, is that true? 5           A. True. 6           Q. But it is your testimony that your 7           primary role is an engineering role; is that 8           right? 9           A. Correct. 10          Q. When Miss Kliphouse indicated to 11           you in this conversation over coffee that she 12           was considering people who did not have 13           traditional sales backgrounds, how did you 14           react, if at all? 15          A. I don't remember. 16          Q. Did hearing that lead you to think 17           that you might be qualified for the job that 18           she was trying to fill? 19          A. Yes. 20          Q. If she had instead told you that 21           it was a traditional sales background she was 22           looking for, would you have expressed interest? 23          A. I think I would have asked her 24           more questions. 25          Q. What more questions would you have	Page 348 Page 350 Page not submitted in support of Google's motion for summary judgment
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<p style="text-align: right;">Page 356</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 358</p> <p>1                   ULKU ROWE 2    that you would not be considered further for 3    the role. 4                   He sent you the job posting; 5    correct? 6    A.    He did. 7    Q.    And do you have that available to 8    you now? I think it should be shared with you 9    I think it is previously marked as Plaintiff's 10   Exhibit 115. 11   A.    In the shared drive, yes. 12   Q.    So you have it in front of you? 13   A.    Yes. 14   Q.    You received this after your 15   conversation with Miss Kliphouse, correct? 16   A.    Correct. 17   Q.    Can you read to me the two lines 18   at the bottom of the first page starting with 19   the word "drawing"? 20   A.    "Drawing upon previous 21   demonstrable success leading sizeable 22   technology sales teams that served the financial 23   services industry." 24   Q.    Did you have previous demonstrable 25   success leading sizable technology sales teams</p>
<p style="text-align: right;">Page 357</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 359</p> <p>1                   ULKU ROWE 2    that served the financial services industry? 3    A.    I had sales experience. I didn't 4    directly lead sales teams, but based on how 5    Kirsten was describing the role, I thought it 6    was appropriate for me to raise my hand. 7    Q.    I didn't ask you whether it was 8    appropriate for you to raise your hand. I just 9    asked you in fact if you had "previous 10   demonstrable success leading sizable technology 11   sales teams that served the financial services 12   industry." Did you? 13   A.    No. 14                  MS. GREENE: Objection, asked and 15                  answered. 16   A.    No, but I had relative experience 17   that would be useful. 18   Q.    Did you have what you just read? 19   A.    No. 20   Q.    Were you discouraged when you read 21   that? 22   A.    No. 23   Q.    Did you -- I want to flip over to 24   the second page of this document in the middle 25   below the words "The financial services leader</p>

<p>1                   ULKU ROWE</p> <p>2   will". Do you see that?</p> <p>3       A. I do.</p> <p>4       Q. Had you ever previously or had you</p> <p>5   ever "managed a team of field sales executives</p> <p>6   and sales managers to meet quarterly and annual</p> <p>7   bookings objectives."?</p> <p>8       A. I have not.</p> <p>9       Q. Have you ever "Recruited top</p> <p>10   talent and coached a team with a focus on</p> <p>11   providing actionable forthright feedback."?</p> <p>12       A. Absolutely.</p> <p>13       Q. Can you give me some examples when</p> <p>14   you have done that?</p> <p>15       A. I have managed many teams in my</p> <p>16   background at JP Morgan, Bank Of America, at</p> <p>17   UBS, I coached teams, I managed large teams, I</p> <p>18   recruited top talent, I coached the teams.</p> <p>19       Q. Any sales teams?</p> <p>20       A. I have not managed sales teams.</p> <p>21       Q. So have you ever coached sales</p> <p>22   teams?</p> <p>23       A. I have not, but that's not what it</p> <p>24   says here.</p> <p>25       Q. Where it says coach the team,</p>	<p>Page 360</p> <p>Page 362</p> <p>Page not submitted in support of Google's motion for summary judgment</p>
<p>Page 361</p> <p>Page not submitted in support of Google's motion for summary judgment</p>	<p>Page 363</p> <p>1                   ULKU ROWE</p> <p>2       A. Correct.</p> <p>3       Q. And that is not a qualification</p> <p>4   that you have, correct?</p> <p>5       A. Well, that's not correct. I have</p> <p>6   not directly managed sales business development</p> <p>7   teams, but I do have the qualifications to be</p> <p>8   able to manage such a team.</p> <p>9       Q. But the qualification described</p> <p>10   here is "Proven success managing a sales</p> <p>11   business development organization to meet and</p> <p>12   exceed revenue goals." Do you have that</p> <p>13   qualification?</p> <p>14       A. No.</p> <p>15       Q. When you read that as one of the</p> <p>16   listed qualifications for this position, did</p> <p>17   that concern you at all?</p> <p>18       A. No, as I said before, I have a lot</p> <p>19   of qualifications both working in the sales</p> <p>20   area with the sales team, both building teams,</p> <p>21   both experience in the financial services</p> <p>22   industry. Experience in the technology</p> <p>23   industry, understanding how Google works. I</p> <p>24   have plenty of qualifications for the role.</p> <p>25       Q. Can you describe all of your</p>

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<p style="text-align: right;">Page 388</p> <p>1                   ULKU ROWE  2   verbal conversation not an e-mail exchange?  3           A. Yes.  4           Q. I want to make sure that we are  5   both on the same page.  6           How long was that conversation?  7           A. I don't remember exactly how long  8   it was, but less than half an hour probably.  9           Q. What's your best estimate as to  10   how much less than a half an hour it was?  11           A. I don't remember. Maybe 20  12   minutes, I don't know.  13           Q. Was it more than five minutes?  14           A. I think so, yes.  15           Q. Do you think it was more than 15  16   minutes?  17           A. Maybe 15, 20 minutes, I don't  18   remember the exact length.  19           Q. Who called whom, if you recall?  20           A. I think it was a video conference  21   so we both dialed into the conference.  22           Q. Who spoke first?  23           A. I don't remember.  24           Q. What did he tell you?  25           A. So, this was a meeting to update</p>	<p style="text-align: right;">Page 390</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>
<p style="text-align: right;">Page 389</p> <p>1                   ULKU ROWE  2   me on the VP of sales role. So he told me that  3   I would not be considered for the role.  4           Q. What did you say in response?  5           A. I asked some questions.  6           Q. What questions did you ask?  7           A. I asked him why.  8           Q. What did he say?  9           A. He said that they were looking for  10   someone that has a more commercial background.  11           Q. What else did you ask?  12           A. I asked him like what made them  13   think that I wasn't qualified for the role.  14           Q. What did he say?  15           A. He said that it was based on a  16   two-hour meeting that I had with Kirsten.  17   Two-hour interview actually he said.  18           Q. What else did you ask?  19           A. I think I added some more prodding  20   questions. I don't remember all the questions.  21   I said to him that I wasn't aware that the  22   meeting that I had with Kirsten was an  23   interview. I said to him that it was like a  24   meet and greet and that it was actually in this  25   meeting that I found out about this role. I</p>	<p style="text-align: right;">Page 391</p> <p>Page not submitted in support of  Google's motion for summary judgment</p>

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